## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA EASTERN DIVISION

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)	CIVIL ACTION NO. 3:06-cv-00544-VPM
<i>)</i>	Judge W. Harold Albritton
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## PLAINTIFF'S MOTION TO COMPEL DEFENDANTS TO PROVIDE MORE ADEQUATE DISCOVERY RESPONSES

Pursuant to Federal Rule of Civil Procedure 37, plaintiff respectfully requests that the Court grant his Motion to Compel Defendants to Provide More Adequate Discovery Responses. Plaintiff further requests that the Court order defendants to provide a full and complete response to plaintiff's discovery request by January 29, 2007. Finally, in accordance with Federal Rule of Civil Procedure 37(4)(a), plaintiff requests that the Court award him reasonable attorneys fees associated with preparation of this motion.

Date: January 23, 2007 Respectfully submitted,

s/ Bryan G. Polisuk
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Counsel for Plaintiff

## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA EASTERN DIVISION

DAVID DAVIS,	
Plaintiff,	
vs.	CIVIL ACTION NO. 3:06-cv-00544-VPM
PHENIX CITY, ALABAMA, et al.	Judge W. Harold Albritton
Defendants.	

## CERTIFICATE OF SERVICE

This is to certify that one true and accurate copy of Plaintiff's Motion to Compel Defendants to Provide More Adequate Discovery Responses was electronically filed on the following counsel for defendants on this 23rd day of January, 2007:

Joshua Robert McKoon McKoon, Thomas, & McKoon 925 Broad Street P.O. Box 3220 Phenix City, AL 36868

> /s/ Bryan G. Polisuk Attorney for Plaintiff